

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JACQUELINE MOEN-LEWIS,

Plaintiff,

and

CDC MANAGEMENT SERVICES, LLC.
and PAUL BOVA, single man,

Defendants.

NO. 3:11-cv-05413

STIPULATION AND ORDER CONTINUING
DEADLINE FOR MOTIONS RELATED TO
DISCOVERY RE: PRIVILEGE LOG AND
EMAIL COMMUNICATIONS OF PARKER

Come now the parties hereto and Stipulate to extend the deadline for motions relating to discovery which is currently set for December 19, 2011 to January 30, 2012, PROVIDED THAT the extension is strictly limited to motions relating to the Privilege Log currently being prepared by the defendants and to the email communications of Deborah Parker which have not yet been produced in readable format in response to plaintiff's most recent discovery requests. The reason for the extension is that the case involves thousands of email communications, over 800 of which have been identified as subject to a claim of work product or of attorney client privilege. The defendants are currently revising the Privilege Log to provide sufficient information on the Log so that the opposing party can accurately determine whether a privilege

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1 or other objection is properly taken. Given the volume of the information, the defendant has
2 been unable to complete the Privilege Log and produce it to Plaintiff's Counsel in a way that it
3 can be meaningfully reviewed, considered and evaluated prior to the deadline for discovery
4 motions set for next Monday, December 19th. Defendant will complete the Log and deliver it to
5 the plaintiff no later than December 30, 2011 so that motions relating to this Privilege Log (and
6 emails not yet produced for Deborah Parker) can be timely made by the new proposed deadline
7 of January 30, 2011.

8 Dated this 15th day of December, 2011

10 MORTON MCGOLDRICK, P.S.

GORDON EDMUNDS GRELISH, PLLC

11 /s/ Kathleen E. Pierce
12 Kathleen E. Pierce, WSBA No. 12631
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17 ORDER

18 This matter having come on for hearing upon the Stipulation of the parties and the Court
19 having reviewed the Stipulation and the records and files herein and being fully advised in the
20 premises it is hereby

21 ORDERED, ADJUDGED AND DECREED the deadline for motions relating to
22 discovery which is currently set for December 19, 2011 be and hereby is CONTINUED to
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*Morton
McGoldrick*
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1 January 30, 2012, PROVIDED THAT the extension is strictly limited to motions relating to the
2 Privilege Log currently being prepared by the defendants and to the email communications of
3 Deborah Parker which have not yet been produced in readable format in response to plaintiff's
4 most recent discovery requests.

5 DATED this 15th day of December, 2011.

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8 ROBERT J. BRYAN
9 United States District Judge

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11 MORTON MCGOLDRICK, P.S.

GORDON EDMUNDS GRELISH, PLLC

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